

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROYAL INDIAN RAJ
INTERNATIONAL CORPORATION,

Plaintiff,

v.

DOMAINS BY PROXY, INC.,
WESTHOST, INC.,.
BILL ZACK,
ANN ZACK,
DIRECT INFORMATION PVT LTD.
(d/b/a DIRECTI)
PIRADIUS NET, and
JOHN DOES 1-7

Defendants

08-cv-03445

Hon. John G. Koeltl

**MOTION TO DISMISS
THE DEFENDANT, ANN ZACK,
PURSUANT TO FED. R. CIV. P.
12(b)(2)**

NOW COMES the defendant, Ann Zack, by and through her attorneys, Cleveland, Waters and Bass, P.A., and hereby moves this Court to dismiss this action against her for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2) for the reasons set forth more fully in the attached Memorandum of Law and supporting Affidavit. Due to the dispositive nature of this pleading, concurrence was neither sought nor obtained.

Respectfully submitted

ANN ZACK
By and through her Attorneys,
CLEVELAND, WATERS AND BASS, P.A.

Date: September 5, 2008

By: /s/ William B. Pribis
William B. Pribis
(NH Bar No. 11348)
Two Capital Plaza
P. O. Box 1137
Concord, NH 03302-1137
Tel. No. (603) 224-7761
Fax. No. (603) 224-6457
E-mail pribisw@cwbpa.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been forwarded this 5th day of September, 2008 to Matthew David Brozik, Esquire.

/s/ William B. Pribis
William B. Pribis